

### Remarks

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1, 2, 6-8 and 44-46 are rejected under 35 USC 102(b) as being anticipated by Tsai 6,300,250, in light of either Tsai et al. 5,575,706 or Uzoh 5,911,619. Claims 3-5, 31-32 and 35-36 are rejected under 35 USC 103(a) as being unpatentable over Tsai '250 in light of Tsai '706 or Uzoh '619. Claims 31-34 and 38-43 rejected under the judicially-created doctrine of obviousness-type double patenting, as being unpatentable over Tsai '250 in light of Tsai '706 or Uzoh '119, in view of Claims 1, 6-7, 12 and 13 of U.S. Patent 6,176,992. Applicant traverses the rejection with respect to amended claim 1, which amendment includes some of the subject matter from claims 31 and 32.

As amended, claim 1 recites that while portions of the seed layer are being removed from the top surface of the substrate, other removal of other portions of the seed layer from the cavities is prevented by applying an electric potential between the substrate and an electrode.

Uzoh does not teach or suggest using an electric potential in this recited manner. Rather, Uzoh teaches using applying a voltage to the electrode that will assist in the removal of material. Accordingly, even if the two Tsai references were combined with Uzoh, the recited combination would not exist.


The dependent claims also contain allowable subject, for at least the reason that their subject matter in combination with that of an allowable base claim contains allowable subject matter.

Submitted herewith is a Terminal Disclaimer as to U.S. Patent No. 6,176,992, thereby obviating the double patenting rejection.

In view of the foregoing and because all objections and rejections have been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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